
Plaintiff Attorney (Pro-se)

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AUG 29 2011

U.S. DISTRICT COURT
MID. DIST. TENN.

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

James Brian Wright,

Plaintiff (Pro-Se),

v.

J&S Extradition Services, LLC, et al.

Defendant(s)

)

)

) Case No.: 3:11-cv-00464

) Judge Haynes

) Motion For Subpoena Duces Tecum NO DENIED

) (Fed. R. Civ. P. 45)

* RELIEF SOUGHT *

Mr. James Brian Wright, Pro-se Plaintiff herein, respectfully moves this Honorable Court to Order the issuance of Subpoena Duces Tecum pursuant to Federal Rules of Civil Procedure, Rule 45, to the foregoing reasons and the Stated Parties:

* GROUNDS FOR SUBPOENA *

The grounds for seeking issuance of Subpoena are:

1. Defendant J&S Extradition Services, LLC, has closed it's business and signed over the business to Mr. Michael Plung.

2. Defendant J&S is in the Process of removing all Property, Selling assets and dissolving the company all together.

3. Defendant J&S could Potentially destroy evidence that could Potentially Jeopardize the evidence and case of the Plaintiffs, such as:

A) Food Receipts, Medical receipts, logs, Fuel receipts and video from the transport of Mr. James Brian Wright.

4. Defendant J&S Extradition Services, LLC, Possesses log books, Papers, Video/audio tapes, files, receipts and other documents that if lost, damaged or destroyed could Jeopardize the Plaintiffs Civil case with no further redress.

5. Defendant Sam Broughton Wright, Jr. is a defendant in this case. His location has not been determined, but, J&S Extradition Services, LLC, Possesses such information.

OKDEN

This motion

is without prejudice
to any document
required to a proper
party.

See

Johnson

v. Hubbard

698 F.2d 286,

289 n.2 (6th Cir

1983).

Will

6-8-11

9-9-11